

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR SKAGIT COUNTY

ARCELIA H. POWERS, a single woman

Plaintiff,

NO.

COMPLAINT FOR PERSONAL  
INJURY AND DAMAGES

WALMART, INC., a foreign  
corporation, dba MT. VERNON  
WALMART, Store #2596,

Defendant.

COMES NOW the plaintiff and for complaint alleges:

I.

Defendant Walmart, Inc., is a foreign corporation doing business in the state of Washington and Skagit County, as a Walmart Store, #2596.

II.

On or about September 10, 2017, plaintiff slipped and fell in the Mt. Vernon Walmart Store while she was shopping as a business invitee. As a result of the fall, she sustained serious and permanent bodily injury.

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Tacoma, Washington 98402  
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III.

Plaintiff's slip and fall was caused by the negligence of Walmart agents and/or employees, who failed to properly clean and otherwise maintain the store, having notice of an unsafe and/or dangerous condition.


IV.

As a result of the foregoing negligence of the defendant, its agents and/or employees, plaintiff incurred past and future medical expenses, past and future income loss, permanent disability, impaired earning capacity, general damages for pain and suffering, loss of enjoyment of life, and other damages, all in amounts to be proven at the time of trial.

WHEREFORE, plaintiff prays for judgment against the defendant, for damages as alleged, plus costs.

DATED this 29<sup>th</sup> day of January, 2018.

WEST LAW FIRM, P.S.

By:   
Thomas J. West, WSBA #5857  
Attorney for Plaintiff